

JOHN G. MCGOWAN, ESQ.
Direct: 315-218-8121
jmcgowan@bsk.com

January 10, 2006

Hon. David N. Hurd
United States District Court
Northern District of New York
Alexander Pirnie Federal Building
10 Broad Street
Utica, New York 13501

Re: *Spero Haritatos v. Hasbro, Inc. and Toys "R" Us (05-CV-930)*

Dear Judge Hurd:

We are counsel for defendant, Toys 'R Us – NY, LLC.

Magistrate Judge DiBianco issued his Protective Order dated December 5, 2005. Plaintiff has objected to that Order requesting one which is far more complex.

Our co-defendant, Hasbro, Inc., shared a Brief it intends to submit and may already have submitted to you, in opposition to the Plaintiff's objections. We were asked to review that Brief and to authorize Hasbro to state that our client, Toys 'R Us, concurs with Hasbro's position and will not file a separate Brief. This is to advise you that we do concur with Hasbro's position as stated in their Brief submitted in opposition to Plaintiff's objections to the December 5, 2005 Order of Magistrate Judge DiBianco.

Thank you for your consideration.

Respectfully yours,

BOND, SCHOENECK & KING, PLLC

s/John G. McGowan

John G. McGowan
Bar Roll No. 501388

cc: Robert E. Purcell, Esq.
Michael D. Sant'Ambrogio, Esq.
JGM/pak